Exhibit 15

Exhibit 15

DECLARATION NO. 5 OF MICHAEL ERWINE

- I, Michael Erwine, declare that the assertions in this Declaration are true and correct, based upon my personal knowledge, and that I am competent to testify to the facts stated below:
- 1. I the Plaintiff in the lawsuit Michael Erwine v. Churchill County and Churchill County Sheriff Benjamin Trotter currently pending before the Federal District Court in Northern Nevada;
- 2. Prior to leaving Churchill County in October of 2016, I had never failed a background investigation or been denied a law enforcement position because of background related issues, rather I was simply not the one or few people chosen out of the often hundreds of applicants;
- 3. In regards to my application with the Washoe County Sheriff's office in 2015, I again did not fail any portion of the process or "was not selected" for an interview as the defense claims. I was notified by Washoe County human resources that the application eligibility list that I was on had expired and I would have to reapply if I wished to still be considered for employment. This also occurred with the Sparks Police department and Lyon County Sheriff's office in 2015. In my experience, Police Departments often have hundreds of applicants for relatively few positions;
- 4. As the email dated November 22, 2016 attached hereto as Attachment A shows, I had ranked number 21 after a physical test, a written test and an interview in the employment process with the Las Vegas Metro Police Department. During my testing, I was informed that there were 50 open spots for the LVMPD academy. This was out of thousands of applicants for the available positions. I was well within the range where if I had passed the background check, I would have been hired by LVMPD. I only failed the process indefinitely after Trotter spoke to

the Background Investigator for the LVMPD, Mr. Olsen;

- 5. I also received the letter dated September 8, 2017 from the Carson City Department of Alternative Sentencing, attached hereto as Attachment B, that states that I failed the background investigation and was "precluded from applying in the future;"
- 6. I also received the letter dated November 14, 2017 attached hereto as Attachment C from the North Las Vegas Police Department indicating that I had been rejected for "character issues" and "employment history." This letter also said that I was "disqualified indefinitely," which was very shocking;
- 7. The Washoe Tribe of California and Nevada has no agreement with any Sheriff that would allow me to take law enforcement action outside of the boundaries of the tribe; and
- 8. In Trotter's October 10, 2016 Memorandum, he states that I created a "hidden Word document." I made no hidden document, and the document in question was saved to the desktop of a work computer owned by Churchill County located in the jail. Anyone with access to Churchill County's IT system could see the document in question and I made no attempt to hide it from anyone.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on:	6/9/21	in Reno, Nevada
By:	~ ~	
-,-	Michael Erwine.	

Attachment A

Attachment A

From: info@governmentjobs.com.
To: mikeerwine22@aol.com.
Subject: Police Recruit (NTN)
Date: Tue. Nov 22. 2016 4:23 pm

Replies to this email will be sent to Toni Bolton <t8365b@lvmpd.com>

*__*__*__*__*__*__*__*__*__*__*__*__*

November 22, 2016

Michael Erwine

Dear Michael:

Congratulations! You have successfully passed the Police Recruit (NTN) selection process. You achieved the following scores and rank on the examination process:

Written Exam Score: 78.26 Oral Board Score: 95.12 Veteran Points (if applicable):

Total Score: 86.69

Rank: 21

Your name will be placed on an eligibility list which is anticipated to be certified by the Civil Service Board on Thursday, December 15, 2016, and will be in effect for 18 months from the date of certification.

The next step in the process will be a comprehensive background investigation. As vacancies arise and depending upon where you placed on the eligibility list, you will be contacted by a Background Investigator to begin this process. To learn about what information and documents will be needed, go to www.protectthecity.com, "Join the Force," "Background." Any questions regarding the background investigation may be directed to your Background Investigator, once assigned.

Again, congratulations and best of luck to you.

very truly yours,

Toni Bolton

Las Vegas Metropolitan Police Department Office of Human Resources

Attachment B

Attachment B

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Department of

ALTERNATIVE SENTENCING



Carson City

Tad Fletcher, Chief

Date: 9/8/2017

To:

Mike Erwine



Dear Mr. Erwine,

Thank you for your interest in the Carson City Department of Alternative Sentencing. This letter is to inform you that you are no longer being considered in the current recruitment due to failing one or more portions of the selection process:

Pre-screening (minimum qualifications)	Written Testing
Physical Agility Testing	X Background Investigation
Oral Board Panel	X Chief's Review
Other	

Pursuant to the pre-employment waiver and the liability release form, you have no right of review of any information obtained during the selection process.

Based on our recruitment standards you are precluded from reapplying with our agency in the future. Again, thank you for your interest in the Carson City Department of Alternative Sentencing. Best wishes in your future endeavors.

Sincerely,

Attachment C

Attachment C

NORTH LAS VEGAS





November 14, 2017

Michael Erwine	
VIA EMAIL: mikeerwine22@aol.com	
Dear Michael,	
An in-depth investigation into your background has been complete are ineligible to continue in the employment process for the position	ed by the North Las Vegas Police Department. We regret to inform you that you on of Police Officer for the following reason(s):
X Character Issues	Criminal History/Involvement
Driving History	Drug History/Involvement
X Employment History	Financial History
Medical Standards Not Met	Military History
Psychological Standards Not Met	Truthfulness Issues
Involuntary Withdraw: (Incomplete background packet and/or requested information)	on not received by NLVPD; did not attend scheduled appointments.)
Voluntary Withdraw: (Verbal/written notification received from you indicating that	you are no longer interested in this position.)
Other: (Please specify):	
The NLVPD is committed to establishing a strong department by useach applicant. Our background process reflects that goal through	sing objective guidelines designed to determine the character and suitability of a strict adherence to our hiring standards.
The Department's hiring standards, the details of the background in confidential and cannot be disclosed.	nvestigation, and all information obtained during the background process are
The North Las Vegas Police Department would like to thank you fo Civil Service Rules and Regulations and the City of North Las Vega with the NLVPD at the present time.	r your interest in employment with our agency. However, in accordance with as Municipal Code 2.68.090, you will no longer be considered for employment
The statement(s) provided above is the only information the D disqualified indefinitely.	epartment will release to you regarding your disqualification. You are
No assumption is made that you are ineligible for employment with	another police agency. We wish you success in your search for employment.
Sincerely,	
Alexander Perez Chief of Police	
Content of Police	
By: 1548 Office Lee #1848 Special Investigations	

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